

1.0 INTRODUCTION

This Hazardous Waste/Materials Contingency Plan (HWMC Plan) was prepared by MASS Compliance for ADESA Auctions Concord herein referred to as "the facility", located at 77 Homer Street in Acton, Massachusetts. This HWMC Plan has been prepared to comply with the Massachusetts Hazardous Waste Regulations 310 CMR 30.520, *Contingency Plan, Emergency Procedures, Preparedness and Prevention*.

Hazardous Waste/Materials Contingency Plan is required because the facility is classified as a generator of hazardous waste and waste oil under the Resource Conservation and Recovery Act (RCRA).

This HWMC Plan is a "written commitment of manpower, equipment and materials" for responding to a discharge of oil and/or hazardous waste/materials at the facility. This HWMC Plan is intended to serve as a guide for ADESA Auctions Concord and designated facility personnel to prevent, reduce and respond to accidental discharges of oil and/or hazardous waste (OHW), specifically by:

1. Identifying areas of potential discharge (e.g., spills and leaks);
2. Identifying preventive, control, and counter measures;
3. Guiding and instructing ADESA Auctions Concord personnel and off-scene responders on response actions.

This HWMC Plan is kept on-file in the General Manager's Office. A copy of this HWMC Plan is also kept on file in ADESA Auctions Concord's Operations Office.

2.0 GENERAL FACILITY INFORMATION

2.1 Location, Description and Classification

ADESA Auctions Concord is located on 77 Hosmer Street in Acton, Massachusetts. Wetlands are located approximately 400 yards to the south/west and topographically and hydraulically downgradient of the facility.

ADESA Auctions Concord is a 60-acre, state-of-the-art facility, equipped for the reconditioning, ~~bodywork~~, vehicle inspection and remarketing of automotive vehicles. The facility has three buildings and a hazardous waste/materials storage shed, the location of which are shown on the facility plan in TAB 2.

As defined under the Massachusetts Department of Environmental Protection (MADEP) 310 CMR, section 30.340, the facility is classified as a Small Quantity Generator (SQG) of hazardous waste and waste oil.

2.2 Layout and Operations

ADESA Auctions Concord operates the facility as automotive remarketing center. The facility's primary operations consist of the reconditioning, bodywork, inspection and sale of automotive vehicles.

Several of these activities and operations involve the usage, storage, handling and generation of OTHW, all of which are conducted in Building #1, Building #2, Building #3, and the Storage Shed.

A description of the layout and facility operations is given below and in Sections 2.3 through 2.6. As shown on the facility plan (TAB 2), the site is divided into three buildings and a storage shed as follows:

Building #1:	Car Wash & Re-inspection
Building #2:	Administration and Auction
Building # 3:	RECON
Storage Shed:	Hazardous Materials/Waste Storage

OIIW is used, stored and/or generated at the Storage Shed. The majority of OIIW that is used, stored and/or generated is associated with the reconditioning of automobiles, mainly in Building #3. OIIW is stored to a lesser extent in Building #1 where automobiles are washed and re-inspected and outside of Building #2, where the emergency generator is located.

2.3 Oil Handling and Storage

Several different grades of oil (including waste oil) and petroleum products are routinely used, stored, handled and/or generated at the facility. These include gasoline, diesel and fuel oil, mineral oil dielectric fluid, hydraulic fluid, and lubricating oil. The locations of these sources are shown on TAB 2 and described in the following sections.

2.3.1 ASTs

There is one, 1000-gallon aboveground storage tank (AST) located outside Building #2 (along the west side) containing diesel fuel. The oil stored in the AST is an energy source for the emergency generator.

In addition, two, 100-gallon portable, aboveground storage tanks (ASTs) are maintained at the site. The gasoline stored in the ASTs is for the refueling of on-site automobiles.

2.3.2 Holding Tank

There is an underground holding tank located outside Building #3 (west side). The holding tank collects discharge from Building #3's industrial floor drain system. The discharge is then processed through the wastewater treatment system located within Building #3.

2.3.3 USTs

There is one, 6,000-gallon underground storage tank (UST) located along the north/east corner of Building #1. The UST contains gasoline used for vehicle fueling.

2.4 Hazardous Waste

Some of the facility's operations (Section 2.2) involve generation and storage of hazardous waste. Hazardous waste routinely generated and stored at the facility includes waste oil, waste oil filters and debris, waste paint and waste paint related materials. Hazardous waste is stored in the Storage Shed located in Parking Area adjacent to Building #3. Hazardous waste is also generated and accumulated in "day cans" within Building #1 and Building #3. Hazardous Waste "day cans" are transferred to the Storage Shed at the end of each shift.

The facility's hazardous waste generation profile, which lists all the wastes, is attached in TAB 3.

2.4.1 Storage Shed (Central Storage Area)

Typically, two, 55-gallon drums (110 gallons) containing hazardous waste (waste oil) are stored in the Storage Shed. The maximum drum storage capacity in this area is 10, 55-gallon drums (550 gallons). Generally, paint and oil related wastes are segregated as follows:

- Wastestream #1: 55-gallon drums of Paint Related Materials, Solid (wipes, rags, filters, absorbants)
- Wastestream #2: 55-gallon drums of Paint Related Materials, Liquid (thinners, solvents, paint)
- Wastestream #3: 55-gallon drums of Waste Oil, Solid (wipes, rags, filters, absorbants)
- Wastestream #4: 55-gallon drums of Waste Oil, Liquid (petroleum containing oils)

The drums of hazardous waste are generated from on-site activities. Drums are labeled, inspected and disposed of by a licensed contractor as required by federal and state hazardous waste regulations.

2.4.2 Building #3

The following hazardous wastes are routinely generated in Building #3:

HW	Process Source	Hazard
Waste Oil, solids (filters, wipes, rags, absorbants)	Automotive Maintenance	Petroleum Oil
Waste Oil, liquids (lubricating oils, brake fluids, hydraulic and misc. petroleum oils)	Automotive Maintenance	Petroleum Oil

MASSACHUSETTS AVENUE

Hazardous Materials
Storage Shed

Building #2: ADM & AUCTION

Building #1: CAR WASH

DIESEL
STORAGE
TANK

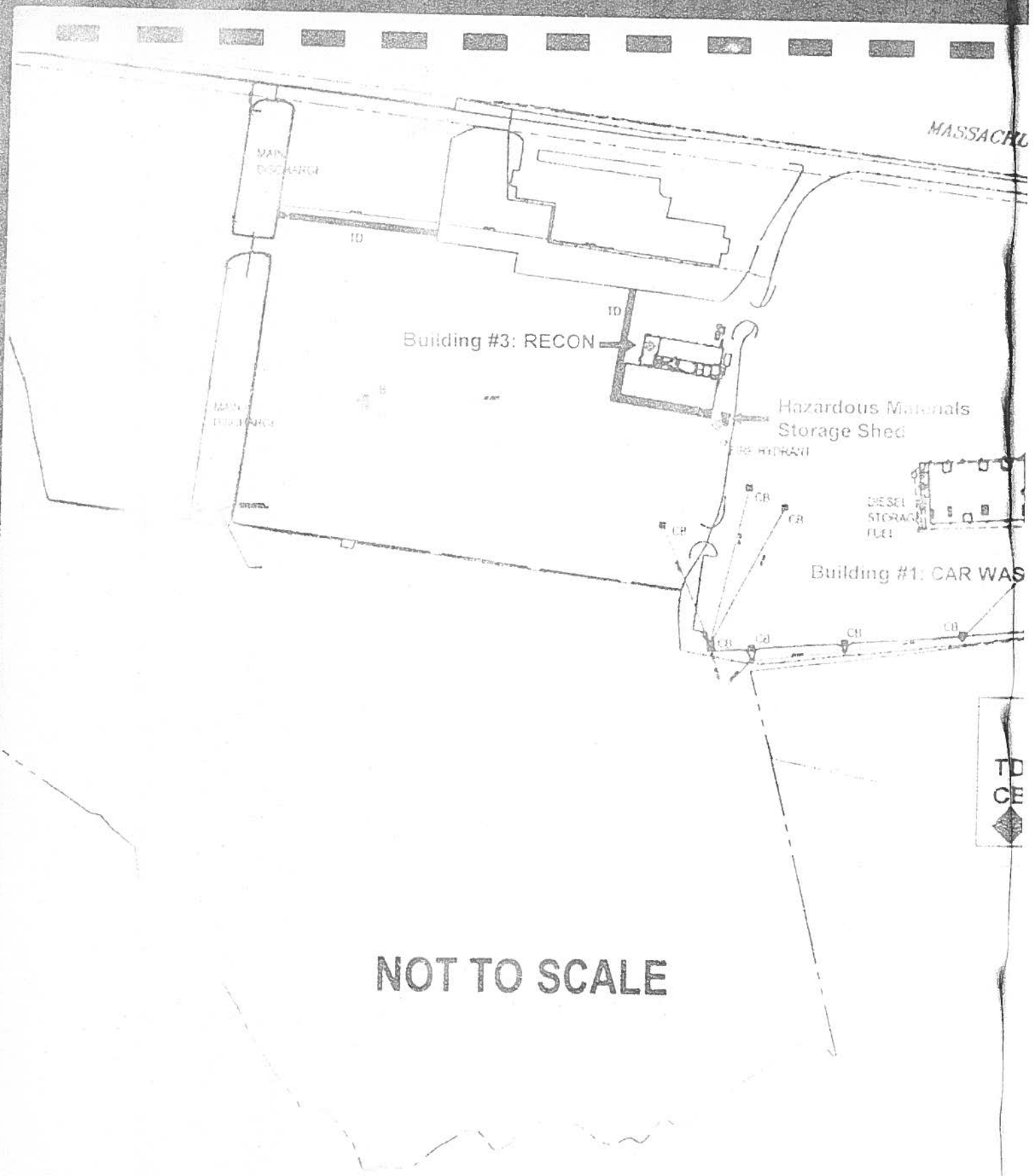
FIRE HYDRANT

FUEL STORAGE TANK

KEY

TD	TRENCH DRAIN
CB	CATCH BASIN
◆	CHEMICAL STORAGE

ADESA-CONCORD
77 Hosmer Street
Acton, Massachusetts



MASSACHUSETTS

MAIN DISCHARGE

TD

Building #3: RECON

TD

Hazardous Materials Storage Shed

FIRE HYDRANT

DIESEL STORAGE TANK

Building #1: CAR WAS

CB

CB

CB

CB

CB

CH

CH

TD
CE

NOT TO SCALE

LIST OF HAZARDOUS MATERIAL

Material Stored	Annual Throughput in Gallons	CONTAINERS AT FACILITY				
		Type	Size	Location	Above or Underground	Size (gal)
All Sol solvent	440	poly drum	55 gal	waste water room	above flammable cab.	6000
Wheel Cleaner	275	poly drum	55-gal	waste-water room	above	1000
Blue Max detergent	550	poly drum	55-gal	waste-water room	above	2000
Brite Spot	110	poly drum	55-gal	waste-water room	above	
Fabric Shield	3	poly drum	1-gal	waste-water room	above	2000
Klear washer solvent	110	poly drum	55-gal	waste-water room	above flammable cab.	
Super Kote detergent	330	poly drum	55-gal	flammable cabinet	above flammable cab.	
Crystal Shield	100	poly drum	1-gal	waste-water room	above	
Auction 1500	10	poly drum	1-gal	waste-water room	above	
Power Brite	440	poly drum	55-gal	waste-water room	above	
Extractor HD	275	poly drum	55-gal	waste-water room	above	
Protect All detergent	165	poly drum	55-gal	waste-water room	above	
Work Out compound	10	poly drum	1-gal	mechanic shop	above	
15W-40 Oil	250	AST poly drum	100	mechanic shop	above	

acid

exposed
cleaner

protective

solvent-
based for
plastic

polish polish
compound

detergent

cleaner

exposed
protective

polish

HAZARDOUS MATERIALS

[illegible]